

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

*

v.

* **Criminal No: RDB-13-0530**

KENNETH ROBINSON, et al.,

*

* * * * * *** * * * *

MOTION TO SUPPRESS STATEMENTS

The defendant, Kenneth Robinson, by and through his attorney, Paul D. Hazlehurst, The defendant, Kenneth Robinson, through his attorney, James Wyda, Federal Public Defender for the District of Maryland, and Paul D. Hazlehurst, Assistant Federal Public Defender, hereby moves this Honorable Court, pursuant to Federal Rule of Criminal Procedure 12(b)(3), to suppress any and all statements, admissions and confessions allegedly given by the defendant, whether oral, written or otherwise recorded, which the government proposes to use as evidence against the defendant at trial and in support of the motion alleges as follows:

1. 1. Mr. Robinson is currently charged in a two-count indictment in the above-captioned case with Conspiracy to Commit Sex Trafficking in violation of Title 18, Section 1594(c) of the United States Code and Sex Trafficking in violation of Title 18, Section 1591(a).

2. Also charged in Count 1 of the indictment are Jeffrey Clark, Craig Judy and Cheralynn Crawford. Mr. Clark is represented by Michael D. Montemarano, Esquire. Mr. Mr. Judy is represented by Alan R. L. Bussard, Esquire, and Ms. Crawford is represented by Harry D. McKnett, Esquire.

3. Discovery materials furnished by the government suggest that the defendant made statements to law enforcement agents on or about October 3, 2013.

3. Any statements, admissions, or confessions were obtained in violation of Mr. Robinson's privilege against self-incrimination and his right to counsel, as guaranteed by the Fifth and Sixth Amendments to the United States Constitution and the Supreme Court's holding in *Miranda v. Arizona*, 384 U.S. 436 (1966).

4. Mr. Robinson is entitled to a hearing regarding the voluntariness of any statements, admissions, or confessions attributed to him in accordance with the provisions of Title 18 U.S.C. § 3501 and the principles set forth in the case of *United States v. Inman*, 352 F.2d 954 (4th Cir. 1965).

WHEREFORE, the defendant moves that all statements, admissions and confessions which the government proposes to use as evidence against him, whether oral, written or otherwise recorded, be suppressed.

Respectfully submitted,

JAMES WYDA
Federal Public Defender
for the District of Maryland

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MEMORANDUM OF POINTS AND AUTHORITIES

1. *Miranda v. Arizona*, 384 U.S. 436 (1966).
2. *United States v. Inman*, 352 F.2d 954 (1965).

Paul D. Hazlehurst
Assistant Federal Public Defender

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th of January, 2014, a copy of the foregoing Motion to Suppress Statements was delivered to Ayn B. Ducao, Assistant United States Attorney, 36 South Charles Street, Maryland 21201 and all other counsel of record

Paul D. Hazlehurst
Assistant Federal Public Defender